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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MARIA MANDUJANO-SANCHEZ,

Defendant.

CASE NO. 2:21-cr-00328-GMN-DJA
2:21-cr-00226-GMN-NJK

**STIPULATION TO SHORTEN
BRIEFING SCHEDULE**

It is hereby stipulated and agreed, by and between Jason Frierson, United States Attorney for the District of Nevada, and Allison Reese, Assistant United States Attorney, and Michael Anthony Hernandez and Jacqueline Tirinnanzi, counsel for Maria Mandujano-Sanchez, that Counsel respectfully requests that this Court extend the deadline for the filing the joint sentencing memorandum from June 20, 2023 to June 21, 2023. This is the parties' first request for an extension. Defense counsel requires one additional day to ensure the accuracy of the joint sentencing memorandum. The government has no objection to shortening the briefing schedule. Denial of this request would deny counsel for Ms. Mandujano-Sanchez sufficient time to

1 effectively and thoroughly prepare, taking into account the exercise of due diligence, especially
2 considering Mr. Hernandez's recent circumstances. The parties stipulate, subject to the Court's
3 approval, that the joint sentencing memorandum is due June 21, 2023 and agree the government
4 response is due June 23, 2023. This stipulation requested is mindful of the exercise of due
5 diligence, in the interests of justice, and not for any purpose of delay.
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10 /s/ Allison Reese
11 Allison Reese
12 Assistant U.S. Attorney

/s/Jacqueline Tirinnanzi
Jacqueline Tirinnanzi
Counsel for Maria Mandujano-Sanchez

13 /s/ Michael Hernandez
14 Michael Hernandez
15 Counsel for Maria Mandujano-Sanchez

16 Dated June 20, 2023,
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19 **IT IS SO ORDERED.**

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21 **HONORABLE GLORIA NAVARRO**
22 **UNITED STATES DISTRICT JUDGE**

23 **DATED:** June 21, 2023
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